

# EXHIBIT EE

**From:** [Aaron Cera](#)  
**To:** [Stameshkin, Liz](#); [Holden Benon](#); [Ghazarian, Colette A](#); [Lauter, Judd](#); [Ghajar, Bobby A.](#); [adunning@cgsh.com](mailto:adunning@cgsh.com); [Kathleen Hartnett](#); [Biksa, Liene](#); [Alvarez, Jessica](#); [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com)  
**Cc:** [Joe Saveri](#); [Cadio Zirpoli](#); [Christopher Young](#); [James Ulwick](#); [Amy Keller](#); [Ruby Ponce](#); [Margaux Poueymirou](#); [Elissa A. Buchanan](#); [Ashleigh Jensen](#); [Heaven Haile](#); [Rya Fishman](#); [Matthew Butterick](#); [Bryan L. Clobes](#); [Alexander Sweatman](#); [Mohammed Rathur](#); [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com); [Nada Djordjevic](#); [David Straite](#)  
**Subject:** Re: Kadrey v. Meta: Disclosure of Data Sources  
**Date:** Thursday, October 31, 2024 11:00:39 AM  
**Attachments:** [Outlook-3s2i4tu2.png](#)  
[Outlook-lo3y1r4n.png](#)

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Counsel,

Pardon the double email.

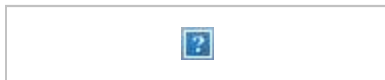
Meta's list of ESI sources also does not include Meta's Manifold (appears to be an internal file-storage similar to S3), which is referenced in Meta produced documents including on a reproduced document Bates labeled Meta\_Kadrey\_00065314.00010.

Please confirm that you have conducted or will be conducting a search for responsive information of Meta's Manifold.

Thank you.

Best,  
Aaron

**Aaron Cera**  
Associate



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San Francisco, CA 94108  
T 415.500.6800 x909  
F 415.395.9940

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**From:** Aaron Cera <aCera@saverilawfirm.com>  
**Sent:** Friday, September 20, 2024 6:49 AM  
**To:** Stameshkin, Liz <lstameshkin@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>  
**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>;

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<ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>

**Subject:** Re: Kadrey v. Meta: Disclosure of Data Sources

Counsel,

Thanks for providing this information.

We note that this list does not include Text Messages or WhatsApp Messages. We believe Meta had a duty to preserve this material and search it for responsive material. Fed. R. Civ. P. 34.

Please confirm that you have conducted or will be conducting a search for text messages and WhatsApp messages. Thank you.

Best,  
Aaron

**Aaron Cera**  
Associate



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---

**From:** Stameshkin, Liz <lstameshkin@cooley.com>

**Sent:** Thursday, September 19, 2024 6:00 PM

**To:** Holden Benon <hbenon@saverilawfirm.com>; Ghazarian, Colette A <cghazarian@cooley.com>;  
Lauter, Judd <jlauter@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com  
<adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; Biksa, Liene  
<lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com  
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**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; julwick@dicellolevitt.com <julwick@dicellolevitt.com>; akeller@dicellolevitt.com <akeller@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Elissa A. Buchanan <EABuchanan@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Heaven Haile <hhaile@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <mrathur@caffertyclobes.com>; dmuller@venturahersey.com <dmuller@venturahersey.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>

**Subject:** RE: Kadrey v. Meta: Disclosure of Data Sources

External (Istameshkin@cooley.com)

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Counsel,

Further to Plaintiffs' request, Meta identifies the following data sources within its possession, custody or control that have been searched and/or collected from to identify potentially responsive or relevant documents or ESI:

- Email
- Workplace Chat
- Contracts
- Google Suite
- Workplace Groups
- Workplace Posts
- Workplace Notes
- Cooley LLP email
- Clearly Gottlieb email
- Public Meta websites (e.g., [research.facebook.com](https://research.facebook.com), ai.meta.com)
- Research Reviews
- Single Review Tool (SRT)
- GitHub
- Research Super Cluster (RSC)
- S3 (AWS servers)

Best,

Liz

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